

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**KENNETH HOWARD TAYLOR II,**

**Defendant**

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**CRIMINAL NO. LKG-24-130**

**MOTION FOR EXTENSION OF TIME FOR BRIEFING**

The United States, through undersigned counsel, respectfully moves for a continuance on the current briefing schedule on the pending pre-trial motions. In support thereof, undersigned counsel states as follows:

1. On August 9, 2024, Kenneth Howard Taylor, through counsel, filed a motion to suppress evidence (ECF No. 28) and on August 19, 2024, he filed a motion to dismiss the indictment (ECF No. 30).

2. Currently, the Government's response in opposition to Defendant's motion to suppress evidence is due September 23, 2024, and the deadline for any replies is October 7, 2024. The Government's response in opposition to Defendant's motion to dismiss the indictment is due October 3, 2024 and the deadline for any replies is October 17, 2024. A hearing on the pending motions is set for December 17, 2024 at 10:30 a.m. ECF No. 33.

3. The Government seeks a one-month extension, until October 21, 2024, for the filing of its responses to both motions, and a concomitant adjustment for the deadline for any replies until November 4, 2024.

4. This Government seeks an extension for additional time to prepare its responses. Both motions raise questions of law requiring fulsome legal research. Additionally, from

September 9, 2024, through September 20, 2024, counsel for the Government is committed to travel for training at the U.S. Department of Justice's National Advocacy Center Training Program and is unable to work on matters during that time. The Government requests this extension so that it may have adequate time to respond to the pending pretrial motions.

5. The defendant, through counsel, has no objection to this motion so long as changes to the briefing schedule do not result in delay to the hearing now scheduled for December 17, 2024.

A proposed order is attached.

Respectfully submitted,

Erek L. Barron  
United States Attorney

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of Court via CM/ECF on September 10, 2024, and thereby served counsel for the Defendant on the date of filing.

Respectfully submitted,

Erek L. Barron  
United States Attorney

By: \_\_\_\_\_/s/\_\_\_\_\_  
Brooke Oki  
Joel Crespo  
Assistant United States Attorneys